ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

TERRI FAULKNER (03)
a/k/a Shae Loveless

No. 4:16-CR-111-O

FACTUAL RESUME

INFORMATION: Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance (methamphetamine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

PENALTY: $1,000,000 fine - not more than 20 years imprisonment, or both such fine and imprisonment, plus a term of supervised release of not less than 3 years.

MAXIMUM PENALTY:
$1,000,000 fine and not more than twenty (20) years imprisonment, plus a term of supervised release of not less than 3 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of $100.00.

ELEMENTS OF THE OFFENSE:
The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Information are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the information;

Second: That the defendant knew of the unlawful purpose of the agreement;

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and

Fourth: That the overall scope of the conspiracy involved a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

In 2014 and 2015, Terri Faulkner received ounce quantities of methamphetamine from Shanda Hawkins, Mathew Rutledge, and Chris Nicholson, often on consignment. In turn, Terri Faulkner distributed methamphetamine to various customers in the Fort Worth and Arlington, Texas areas, returning to Shanda Hawkins, Mathew Rutledge, and Chris Nicholson for additional methamphetamine. In this manner, Shanda Hawkins, Mathew Rutledge, Chris Nicholson, and Terri Faulkner conspired with each other and others to possess methamphetamine with intent to distribute.

SIGNED this [illegible] day of May, 2016.

TERRI FAULKNER
Defendant

BRIAN O'SHEA
Counsel for Defendant